



TRINITY CENTRE
115 BROADWAY, 17TH FLOOR
NEW YORK, NY 10006
TEL: (212) 566-1000
FAX: (212) 566-1068

June 17, 2018

Via ECF

Honorable Raymond J. Dearie
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Vitaly Korchevsky
15 Cr. 381 (RJD)

Dear Judge Dearie:

We have received the government's June 16, 2018, late-night disclosure and are in the process of reviewing it. We have also received co-defendant's Motion to Strike and Preclude Witness Testimony, which requests: (1) that Igor Dubovoy's testimony be stricken in its entirety; (2) that Arkadiy Dubovoy be precluded from testifying at trial; (3) that Court acknowledge the government's failure to provide a full financial accounting for Arkadiy Dubovoy; (4) that the Court require the government to provide an explanation for the late disclosure of Katherine Pierce's grand jury testimony, and also allow the defense sufficient time to review the additional 3500 material; and (5) that additional discovery be produced as outlined in the Motion.

We join co-defendant's Motion in all respects. Additionally, we reserve the right to make additional substantive and discovery requests as warranted by these recent and disturbing developments.

Respectfully submitted,

Sullivan & Brill, LLP
Attorneys for Mr. Korchevsky

A handwritten signature in black ink, appearing to read "Steven Brill".

By: Steven Brill
James Healy
Rachel Brill